

RESPONSES TO COMMENTS ON DRAFT RML IRF EMERGENCY RESPONSE PLAN

General Response:

The Emergency Response Plan (ERP) for the Integrated Research Facility (IRF) at the Rocky Mountain Laboratories (RML) was developed with input from specialists and professionals with expertise in biomedical research, safety, biosafety, biocontainment, infectious diseases, public health, animal care, emergency planning and response, legal affairs, and communications. It is modeled after similar emergency plans for Biosafety Level -4 (BSL-4) laboratories at other facilities, but was expanded to provide information on the evaluation and management of exposures to relevant biological agents, on the interactions with local medical and public health officials, and on incident communications.

The purpose of the ERP is to address incidents, situations, and emergencies that might arise as a consequence of research activities in the specialized laboratories of the IRF at RML. It is specific for the IRF, and does not supplant or replace the more general emergency response programs that are in place for RML. The ERP was coordinated and is consistent with the Ravalli County emergency preparedness plans however specific information about procedures which are the responsibilities of the Ravalli County Public Health Officer, the Ravalli County Public Health Nursing Department, the Ravalli County Office of Emergency Management, and other emergency response personnel are beyond the scope of this ERP. Those entities have certain mandatory statutory authorities and jurisdictions, although RML works closely with these local officials and agencies in the event of incidents, situations, or emergencies. Consequently, the specific documents and procedures that those entities use are not included in RML's emergency response or safety plans.

The target audience for the IRF ERP is NIH/RML staff and contract personnel, primarily those who will be working in the IRF. NIH/RML agreed to submit the ERP for public comment as part of a Lawsuit Settlement reached with three plaintiff groups in 2004 and the public may always access the current version on the NIAID website (www.niaid.nih.gov/RMLERP).

Term # 4 of the Lawsuit Settlement Order stated:

“NIH will provide a detailed emergency plan by April 30, 2006 for the Integrated Research Facility (IRF) at RML, coordinated and consistent with the Ravalli County emergency preparedness plan, and will make that plan available for public comment. Said public comments must be submitted within 30 days. NIH will respond to all timely comments within 60 days.”

NIH/RML extended the comment period for a total of more than 60 days to ensure that interested groups and members of the public had maximal opportunity to comment; specifically, the plan was made available from April 21, 2006 until June 30, 2006. The IRF ERP was posted on the NIAID website. In order to assure maximum awareness of the plan and engage the community, RML/NIH sent printed copies of the ERP along with CDs to the following: all members of the RML Community Liaison Group; city, county and state governmental officials including the Mayor of Hamilton, the Ravalli County Commissioners and the Montana Governor; health care practitioners in Ravalli County; all three Federal legislators; the Bitterroot Public Library, the North Valley Library, the Darby Library, the Missoula Public Library, and the Mike and

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Maureen Mansfield Library at the University of Montana in Missoula. RML staff members were also informed about the plan. A postcard announcing the availability was mailed to the RML neighbor list which comprises approximately 200 households. Hard copies and CDs were also made available for the public in the RML Visitor's Center. Finally, a news release about the plan was issued to local news media, and an article describing the plan and its availability was published in the April 25, 2006 issue of the Ravalli Republic.

In addition to these extensive efforts publicizing the ERP, the plan was also provided in the Course Syllabus for a Biosafety Level -4 Emergency Training Class that was held at RML. This class was offered to 103 individuals representing private, local, State and Federal interests in medicine, law enforcement, emergency medical services, public health, disaster and emergency services, and government; 73 of the invitees attended.

When the ERP was released for public comment, NIH noted on the IRF ERP website that the comments along with the responses would be posted to that same web address (www.niaid.nih.gov/RMLERP).

Prior to the close of the comment period, a total of four written comments were received: (Letter #1) from the Emergency Preparedness Coordinator for Ravalli County, (Letter #2) from the Women's Voices for the Earth, (Letter #3) from a private company doing business as Confab, and (Letter #4) from a new member of the RML Community Liaison Group representing the Coalition for a Safe Lab. NIH/RML would like to thank those who offered comments on the IRF ERP. The four comments are provided below in that order, with responses from NIH/RML inserted in the appropriate location. The comments remarked on the basic thoroughness of the plan, and there were some requests for clarification on specific points. After considering the comments, NIH/RML incorporated several changes to the IRF ERP.

By publishing the comments and responses, NIH/RML have fulfilled the requirements of Term # 4 of the Lawsuit Settlement Order. However, as noted in the IRF ERP Introduction, the plan is a dynamic document that will be periodically updated as warranted. The current version will be posted at www.niaid.nih.gov/RMLERP. Additional comments or inquiries are always welcome, and NIH/RML reserves the right to respond as deemed appropriate. Comments or inquiries may be addressed to:

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